

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

_____)	
)	
JIMMY GEDEON)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:22-cv-00388-JL
)	
UNITED HEALTHCARE)	
SERVICES, INC.)	
)	
Defendant.)	
_____)	

**DEFENDANT’S MOTION TO EXTEND TIME TO FILE AN OBJECTION TO
PLAINTIFF’S MOTION TO SEAL COURT RECORDS TO JUNE 21, 2024**

Defendant United Healthcare Services, Inc., by its attorneys, Jackson Lewis, P.C., moves this Court to extend the time for Defendant to reply to Plaintiff’s Motion to Seal Court Records. In support of this motion, Defendant states as follows:

1. Plaintiff filed his Motion to Seal Court Records on May 24, 2024.
2. The current deadline for Defendant to file its objection is June 11, 2024.
3. Due to time constraints related to other professional responsibilities and personal commitments, including scheduled vacation time, Defendant’s counsel requires additional time to adequately prepare an objection.
4. Accordingly, Defendant requests a brief extension to June 21, 2024 to file an objection to Plaintiff’s Motion to Seal Court Records.
5. The requested extension will not result in the continuance of any hearing, conference, or trial because this case is stayed pending the arbitration.

6. Due to the nature of this motion, no memorandum of law is required as the relief sought is within the sound discretion of the Court.

CONCURRENCE STATEMENT, LR 7.1(c)

7. Plaintiff was contacted for assent and indicated that he is unwilling to assent to the relief requested.

WHEREFORE, United Healthcare Services, Inc. respectfully requests that this Honorable Court:

- A. Grant this motion and extend Defendant's objection deadline to June 21, 2024; and
- B. Grant such other and further relief as this Court deems just and proper.

Respectfully Submitted,

**UNITED HEALTHCARE
SERVICES, INC.**

By its attorneys,

JACKSON LEWIS P.C.

Date: June 4, 2024

By: /s/ Ashley R. Theodore
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed with the Court using the Court's ECF filing system and that a copy was served on Plaintiff via email and U.S. First Class Mail, postage prepaid.

Date: June 4, 2024

s/ Ashley R. Theodore
Ashley R. Theodore